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NAS WHITING FIELD  
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LETTER REGARDING PROPOSED CHANGE IN ANALYTICAL METHOD FOR  
GROUNDWATER SAMPLES COLLECTED TO SUPPORT PHASE 1 REMEDIAL  
INVESTIGATION NAS WHITING FIELD FL

3/21/1991  
U S EPA REGION IV



MAR 21 1991

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

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4WD-RCRA&FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Ted Campbell  
Remedial Activities Branch  
Department of the Navy - Southern Division  
Naval Facilities Engineering Command  
1255 Eagle Drive  
P.O. Box 10068  
Charleston, South Carolina 29411-0068

Re: Proposed change in VOC analytical method for groundwater samples collected during Phase I (screening) investigations.  
NAS Whiting Field  
Milton, Florida

Dear Mr. Campbell:

The Environmental Protection Agency (EPA) has reviewed your FAX correspondence regarding the above-referenced situation at NAS Whiting Field. The following is our comment on the proposed change in analytical method for VOC analyses of groundwater samples collected via the Bengt-Arne-Tornessen (BAT) procedure.

NAS Whiting Field is not currently a RCRA or CERCLA facility. As such, EPA has no regulatory jurisdiction over the current Phase I investigative program. Should NAS Whiting Field become a RCRA or CERCLA facility, then the data currently being collected would be subject to EPA review and approval. We are therefore commenting on the adequacy of your recommended revised procedures in meeting the requirements of these regulatory programs, in the event that NAS Whiting Field should become a CERCLA or RCRA facility at some future date.

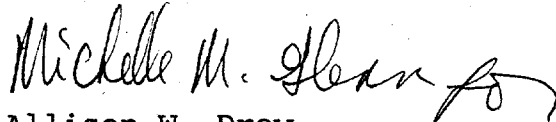
As stated in the correspondence FAXed to this office from Mr. Michael Keirn on February 13, 1991, the BAT sampling procedure provides Level II quality data. Thus, while the work plan approved by the Navy calls for QC Level III or IV USEPA CLP-COP laboratory analytical procedures, the proposed change to QC Level II required by the newly-proposed analytical method (SW-846 no. 8240) is not inconsistent with the data quality of the sample collection procedure. In essence, the quality of the proposed laboratory QC is consistent with the screening nature of the sampling procedure.

Furthermore, as verified by Mr. Wade Knight of USEPA Region IV Environmental Services Division's (ESD) Analytical Support Branch, the proposed method: SW-846 no. 8240 is very similar to the previously-approved CLP-COP method. The main difference

between the two lies in QC level and documentation, since both methods employ Gas Chromatography/Mass Spectroscopy (GC/MS) instrumentation. The SW-846 method is a RCRA method and would therefore clearly meet the requirements of that program. Because of its similarity to originally-proposed CLP method, Mr. Knight also believed that the data would satisfy CERCLA program requirements.

If there are any questions regarding these comments, please contact me or Mr. Michael Hartnett, Chief, DOD Remedial Unit, at (404) 347-3016.

Sincerely,



Allison W. Drew  
Remedial Project Manager  
RCRA & Federal Facilities Branch

cc: Eric Nuzie, FDER  
James Malone, SOUTHNAVFACENGCOM  
Wade Knight, USEPA-ESD-ASB